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*Counsel for Movant Bridgestone Investment Corporation Limited
 and Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

KALMAN ISAACS, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC.,

Defendants.

)
) Case No. 3:18-cv-004865-EMC
)
) CLASS ACTION
)
) DECLARATION OF RAMZI ABADOU IN
) SUPPORT OF BRIDGESTONE INVESTMENT
) CORPORATION LIMITED’S MOTION FOR: (I)
) CONSOLIDATION OF RELATED ACTIONS; (II)
) APPOINTMENT AS LEAD PLAINTIFF; AND (III)
) FOR APPROVAL OF ITS SELECTION OF LEAD
) COUNSEL
)
) Judge: Hon. Edward M. Chen
) Date: November 15, 2018
) Time: 1:30 p.m.
) Courtroom: Courtroom 5 – 17th Floor
)
)
)

1 WILLIAM CHAMBERLAIN, on behalf of)
 himself and all other similarly situated,) No. 18-cv-04876-EMC
 2)
 Plaintiff,)
 3)
 v.)
 4)
 TESLA, INC., and ELON MUSK,)
 5)
 Defendants.)
 6)
 7)

8
 9 JOHN YEAGER, Individually and on)
 Behalf of All Others Similarly Situated,) No. 18-cv-04912-EMC
 10)
 Plaintiff,)
 11)
 v.)
 12)
 TESLA, INC. and ELON MUSK,)
 13)
 Defendants.)
 14)
 15)

16
 17 CARLOS MAIA, on behalf of himself and)
 all others similarly situated,) No. 18-cv-04939-EMC
 18)
 Plaintiff,)
 19)
 v.)
 20)
 TESLA, INC. and ELON R. MUSK,)
 21)
 Defendants.)
 22)
 23)

KEWAL DUA, Individually and on Behalf)
of All Others Similarly Situated,) No. 18-cv-04948-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC. and ELON MUSK,))
))
Defendants.))
))
)

JOSHUA HORWITZ, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05258-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC. and ELON R. MUSK,))
))
Defendants.))
))
)

ANDREW E. LEFT, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05463-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC., and ELON R. MUSK,))
))
Defendants.))
))
)

1 ZHI XING FAN, Individually and On)
2 Behalf of All Others Similarly Situated,) No. 18-cv-05470-EMC
3)
4 Plaintiff,)
5)
6 v.)
7)
8 TESLA, INC. and ELON R. MUSK,)
9)
10 Defendants.)
11)
12)
13)
14)
15)
16)
17)
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22)
23)
24)
25)
26)
27)
28)

8 SHAHRAM SODEIFI, Individually) No. 18-cv-05899-EMC
9 and on behalf of all others similarly)
10 situated,)
11)
12 Plaintiff,)
13)
14 v.)
15)
16 TESLA, INC., a Delaware)
17 corporation, and ELON R. MUSK, an)
18 individual,)
19)
20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)

1 I, Ramzi Abadou, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California and am admitted
3 to this District.

4 2. I submit this Declaration, together with the attached exhibits, in support of the Motion
5 of Bridgestone Investment Corporation Limited (“Bridgestone”) to Consolidate the Related Actions,
6 to appoint Bridgestone to serve as Lead Plaintiff on behalf of the Class in this Action and to approve
7 its selection of Kahn Swick & Foti, LLC as Lead Counsel. I am fully familiar with the facts set forth
8 herein.

9 3. Attached hereto as Exhibit A is a true and correct copy of the sworn certification of
10 Jian Liu on behalf of Bridgestone, reflecting Bridgestone’s transactions in Tesla, Inc. (“Tesla”)
11 securities during the Class Period.

12 4. Attached hereto as Exhibit B is a table reflecting the calculated losses incurred by
13 Bridgestone as a result of its purchases of Tesla securities during the Class Period.

14 5. Attached hereto as Exhibit C is a true and correct copy of the press release published
15 on August 10, 2018 on *PR Newswire*, a well-known national business-oriented publication,
16 announcing the pendency of the lawsuit commenced against Defendants herein.

17 6. Attached hereto as Exhibit D is a true and correct copy of the firm résumé of Kahn
18 Swick & Foti, LLC.

19 7. Attached hereto as Exhibit E is a table reflecting the calculated losses incurred by
20 Bridgestone as a result of its transactions in Tesla securities during the Class Period.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing facts are true and correct.

23 Executed this 9th day of October, 2018, at San Francisco, CA.

24
25 /s/ Ramzi Abadou
26 RAMZI ABADOU
27